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Via ECF

The Honorable Denise L. Cote
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: Request to File Under Seal

NCUA v. RBS Securities Inc., No. 11-02340 (D. Kan.)
NCUA v. RBS Securities Inc., No. 11-05887 (C.D. Cal.)
NCUA v. Morgan Stanley & Co., No. 13-06705 (S.D.N.Y.)

Dear Judge Cote:

In accordance with Rule 4(A) of the Court's Individual Practices in Civil Cases, and Paragraph 9 of the Master Protective Order, RBS requests that it be allowed to file the attached Reply in Support of Motion to Compel the Production of Compensation Documents in redacted form.

Pursuant to § 2 of the Master Discovery Protocol (ECF 101),¹ because the accompanying brief applies only to the California and Kansas Actions, RBS is concurrently filing its brief in *NCUA v. RBS Securities Inc.*, No. 11-02340 (D. Kan.) in accordance with District of Kansas Local Rule 5.4.6, and in *NCUA v. RBS Securities Inc.*, No. 11-05887 (C.D. Cal.) in accordance with Central District of California Local Rule 79-5.1.

RBS has redacted the portions of its brief that concern deposition testimony given by Connie Loveless, which Plaintiff designated as Confidential. Paragraph 9 of the Master Protective Order provides:

In the event that before trial in the Related Actions, or in connection with any hearing in or any matter relating to the Related Actions, counsel for any Party determines to file or submit in writing to the Clerk's office any Protected Material, or any papers containing or

¹ All ECF references are to *NCUA v. Morgan Stanley & Co.*, No. 13-06705 (S.D.N.Y.).

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making reference to the substance of such material or information, such documents or portions thereof containing or making reference to such material or information shall be filed with a request that the documents be filed under seal in accordance with the rules of the Court, and kept under seal until further order of the Court.

In accordance with Rule 4(A) of the Court's Individual Practices in Civil Cases, and Paragraph 9 of the Master Protective Order, RBS requests permission to file its brief in redacted form.

Very truly yours,

/s/ R. Alexander Pilmer

R. Alexander Pilmer

cc: Counsel of Record (via ECF)